

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

GOLDMAN & BESLOW, LLC

Attorneys at Law

7 Glenwood Avenue

Suite 311B

East Orange, New Jersey 07017

(973) 677-9000 (phone)

(973) 675-5886 (fax)

David G. Beslow, Esq. #DGB-5300

Attorneys for Debtor, Jacqueline Staton-Johnson

In Re:

JACQUELINE STATON-JOHNSON,

Debtor

Case No.: 19-22576

Judge: RG

Chapter: 13

CHAPTER 13 DEBTORS ATTORNEY'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (choose one):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☒ Certification of Default filed by _____ Chapter 13 Trustee _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

- ☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

This office represents the Debtor, who was unable to appear in our office prior to the opposition deadline. We respectfully request that the Court schedule a hearing on this matter. The Debtor has actively participated in this case, having paid \$84,961 into her plan since filing bankruptcy. We will continue to work to bring the Debtor into our office to prepare formal opposition prior to the hearing.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: June 5, 2023

/s/ David G. Beslow, Esq.
Debtor's Attorney

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.